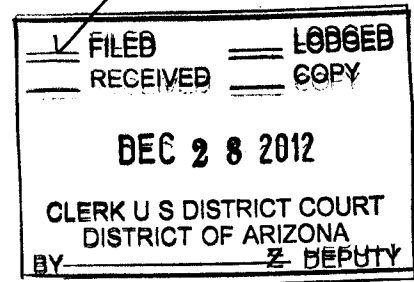


Kieran Gallagher
16618 S 30th Drive
Phoenix, AZ 85045
gallagherkieran@aol.com
(480) 332-0234



IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

-----X
Kieran M. Gallagher,

Plaintiff

vs.

Janet Napolitano,

COMPLAINT

Secretary.

CV-12-02733-PHX-JAT

Department of Homeland Security,

Defendant
-----X

COMPLAINT FOR PRODUCTION OF DOCUMENTS

UNDER THE FREEDOM OF INFORMATION ACT

1. This action arises out of the Freedom of information Act (FOIA), 5 U.S.C. section 552.
2. On July 25, 2012, plaintiff submitted a Freedom of Information Request to defendant, requesting documents pertaining to his past employment with the Federal Air Marshal Service. On September 7, 2012, defendant informed plaintiff that such a request requires an accompanying notarized perjury statement. Plaintiff then resubmitted his request, as per defendant's directions. On October 3, 2012, defendant acknowledged receipt of plaintiff's conforming request (attached). As of date of this filing, plaintiff has neither received requested documents nor any further communication from defendant, in violation of statute.
3. Therefore, plaintiff demands defendant fully and immediately comply with his Freedom of Information request.

Dated:

12/28/2012

Kieran M. Gallagher

Kieran M. Gallagher

16618 S 30th Drive

Phoenix, AZ 85045

(480) 332-0234

U.S. Department of Homeland Security
Freedom of Information Act Office
601 South 12th Street
Arlington, VA 20598-6020

OCT - 3 2012



Transportation
Security
Administration

Ms. Kieran Gallagher
16618 S 30th Drive
Phoenix, AZ 85045

Re: **TSA13-0019**

Dear Ms. Gallagher:

This office previously acknowledged your request on September 7, 2012. At that time, you were informed that your FOIA request was received in this office, that it was assigned identification number TSA12-0712, and that we required you submit a signed perjury statement in order to continue processing the request. Upon receipt of your signed perjury statement on October 2, 2012, we reopened your case under a new case number, **TSA13-0019**.

Please refer to your case identifier, **TSA13-0019** in any future correspondence. You may contact this office at 1-866-364-2872.

Sincerely,

A handwritten signature in black ink that reads "Aeron J. Pinero".

Ms. Aeron J. Pinero
Operations Manager
Freedom of Information Act Office
Office of Civil Rights & Liberties,
Ombudsman and Traveler Engagement
Transportation Security Administration